

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

**STEVEN J. SICO, Esq.
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Attorney for Debtor(s)
BAR ID # 019301997**

Case No. 21-10174-MBK

In the Matter of:

HEARING DATE: 3/18/2021 @ 10:00AM

Honorable MICHAEL B. KAPLAN

EAGLE ROADWAYS, INC.

Chapter 11

Debtor(s)

**NOTICE OF MOTION TO COMPEL
CHASE BANK TO RELEASE LIEN
ON ACCOUNT AND CLOSE PRE-PETITION
BUSINESS ACCOUNT AND TRANSFER MONIES
TO DEBTOR IN POSSESSION ACCOUNT**

**To: CLERK, UNITED STATES BANKRUPTCY COURT
402 East State Street
Trenton, NJ 08608**

VIA ECF ONLY

**United States Trustee
One Newark Center
Suite 2100
Newark, NJ 07102
Attn: Maggie McGee, Esq.**

VIA ECF ONLY

PLEASE TAKE NOTICE, that on 3/18/2021 at 10:00 o'clock in the morning, or as soon thereafter as counsel may be heard, Steven J. Sico attorney for Debtors herein, shall move before the Honorable Michael B. Kaplan U. S. Courthouse, 402 East State Street, Trenton, NJ 08650 Courtroom #8 for an Order compelling Chase Bank to close account ending with # 8962.

WHEREFORE, Debtors request that an Order be entered in favor of the Debtors' bankruptcy case, and for such other and further relief as is just.

Debtors will rely upon this notice of motion, the supporting certification, and any oral argument as may be required by the Court. Debtors have not submitted a brief herewith because there are not unique or complicated issues of law or fact involved.

Dated: 2/17/2021

STEVEN J. SICO

STEVEN J. SICO, Esq.
Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

EAGLE ROCK ROADWAYS, INC.

DEBTOR

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Chapter 11

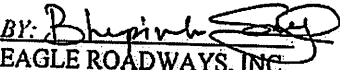
Case No. 21-10174-MBK

**APPLICATION OF DEBTOR COMPEL CHASE BANK TO VACATE LEVY
AND CLOSE ACCOUNT ENDING IN #8962**

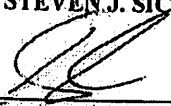
1. The Debtor has filed a petition for Bankruptcy relief under Chapter 11.
2. The Debtor has one (1) remaining pre-petition operating account with Chase Bank ending in account # 8682 with approximately \$48,992.00. Said account has been levied on due to a State Court Judgment Creditor listed in schedule F namely Interpool, under Docket # MID-L-007466-19.
3. Chase Bank has been noticed of the bankruptcy proceeding in writing and refused to release the lien, close the account and tender the monies to Debtor.
4. The monies referenced in the account herein are needed to reorganize the company and the Debtor asks the Court to compel Chase Bank to vacate the levy, close the account and issue a check to the Debtor payable to the Debtor and his debtor in possession account.

Respectfully submitted,

THE LAW OFFICE OF STEVEN J. SICO, ESQ.

By: 
EAGLE ROADWAYS, INC.
By: Bhupinder Singh
Owner and Sole Shareholder

By:


STEVEN J. SICO, ESQ.
BAR I.D. No. 019301997

Dated: February 17, 2021

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) STEVEN J. SICO, ESQ. 235 MAIN STREET WOODBIDGE, NJ 07095 ATTORNEY FOR DEBTORS	
In Re: EAGLE ROADWAYS, INC.	Case No.: 21-10174-MBK Chapter 11 Judge: MICHAEL B. KAPLAN

1. The relief set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**.

Order Page 2 of 2

The relief set forth herein is hereby ORDERED:

2. Upon Motion of Steven J. Sico , Chase Bank is Ordered to vacate any lien on Eagle Roadways Inc. checking account ending in #8682 and said monies are to made payable to the Debtors current Debtor in Possession Operating Account.

The movant shall serve this Order upon all counsel of record, via ECF and via regular mail within 7 days of entry of this Order.

Dated:
